

LEE LITIGATION GROUP, PLLC

148 WEST 24TH STREET, EIGHTH FLOOR

NEW YORK, NY 10011

TEL: 212-465-1180

FAX: 212-465-1181

INFO@LEELITIGATION.COM

WRITER'S DIRECT: (212) 465-1188
cklee@leelitigation.com

September 28, 2022

Via ECF

The Honorable Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Joseph v. Watch Guard 24/7 LLC et al*
Case No.: 22-cv-05935-RA

Dear Judge Abrams:

This firm represents Plaintiff in the above-referenced matter. We write, jointly with counsel for Defendants, to respectfully request a stay in this action, which will include a stay of Defendants' Answer currently scheduled for September 30, 2022. Parties request this stay continue pending the completion of parties' contemplated class-mediation to be held on December 19, 2022.

After several discussions, the parties have agreed to engage in private mediation with third-party mediator, Ms. Dina Jansenson. This date is the earliest date that Mr. Jansenson, whom the parties found mutually agreeable, had available that worked for all parties and counsel involved.

Additionally, the parties request that they report to the Court concerning the outcome of the mediation in a joint letter by December 30, 2022. If the parties are unable to reach a resolution at mediation, the parties propose that they with their joint letter submit a Scheduling Order and date by which Defendants will Answer the Complaint.

We thank Your Honor for considering our request.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

Application granted.

cc: all parties via ECF

SO ORDERED.



Hon. Ronnie Abrams
09/29/2022